

Hogan Lovells

MEMO ENDORSED

Hogan Lovells US LLP
390 Madison Avenue
New York, NY 10017
T +1 212 918 3000
F +1 212 918 3100
www.hoganlovells.com

Dennis H. Tracey, III
Partner
T +1 212 918 3524
dennis.tracey@hoganlovells.com

April 1, 2022

VIA ECF

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007
(212) 805-6350
CaproniNYSDChambers@nysd.uscourts.gov

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 4/4/22

Re: *Syracuse Mountains Corp. v. Petróleos de Venezuela S.A.*, No. 21-cv-2684- VEC

Dear Judge Caproni:

We represent defendant Petróleos de Venezuela, S.A. (“PDVSA”) in the above-referenced action. We write to seek leave of the Court to file the Amended Answer attached hereto as Exhibit 1, which adds champerty as an affirmative defense. A redline of the Amended Answer, which reflects the changes from PDVSA’s original answer filed on December 1, 2021 [ECF No. 33], is attached hereto as Exhibit 2.

Plaintiff has consented to the filing of the Amended Answer. We request that the Court grant leave to file the Amended Answer. If the Court so requires, PDVSA will submit a formal motion seeking leave to file the Amended Answer.

Respectfully submitted,

/s/ Dennis H. Tracey, III
Dennis H. Tracey, III
Counsel for PDVSA

Application GRANTED. Defendant must file its Amended Answer not later than April 8, 2022.

SO ORDERED.


4/4/22

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE